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December 19, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: *Notice of Ex Parte Communication*
GN Docket No. 18-122

Dear Ms. Dortch:

Per FCC Rule 1.1206, this letter provides notice that on December 19, 2018, Preston Padden, Head of Advocacy and Government Relations for the C-Band Alliance, sent the attached email to: Chairman Ajit Pai; Commissioner Michael O’Rielly; Commissioner Brendan Carr; Commissioner Jessica Rosenworcel; Donald Stockdale, Bureau Chief, Wireless Telecommunications Bureau; Tom Sullivan, Bureau Chief, International Bureau; Julius Knapp, Chief, Office of Engineering and Technology; Nicholas Degani, senior counsel to Chairman Pai; Rachael Bender, legal advisor to Chairman Pai; Erin McGrath, legal advisor to Commissioner O’Rielly; Will Adams, legal advisor to Commissioner Carr; and Umair Javed, legal advisor to Commissioner Rosenworcel.

The email emphasizes that the C-Band Alliance plan is the only one that will make substantial C-Band spectrum available to wireless carriers quickly to drive 5G deployment, including in rural areas, while fully protecting existing C-band subscribers. The email also provides detail on the satellite procurement plan that will allow CBA members to operate approximately the same amount of capacity for its customers in less spectrum.

Please contact the undersigned with any questions regarding this letter.

Respectfully submitted,

/s/ Jennifer D. Hindin
Jennifer D. Hindin
Counsel for the C-Band Alliance

Attachment

ATTACHMENT

From: PRESTON PADDEN <ppadden@me.com>

Date: December 19, 2018 at 8:51:54 AM EST

To: Ajit Pai <ajit.pai@fcc.gov>, Mike O'Rielly <Mike.Orielly@fcc.gov>, Brendan Carr <Brendan.Carr@FCC.gov>, Jessica Rosenworcel <Jessica.Rosenworcel@fcc.gov>, Donald Stockdale <donald.stockdale@fcc.gov>, Julius Knapp <Julius.Knapp@FCC.gov>, Thomas Sullivan <Thomas.Sullivan@fcc.gov>, Matthew Berry <matthew.berry@fcc.gov>, Rachael Bender <rachael.bender@fcc.gov>, Nick Degani <Nicholas.Degani@fcc.gov>, Erin McGrath <Erin.McGrath@fcc.gov>, Will Adams <will.adams@fcc.gov>, Umair Javed <umair.javed@fcc.gov>

Subject: New Satellites For C-Band

The C-Band Alliance is very pleased to have presented to the FCC, the wireless industry and the C-band user community the only plan that makes substantial C-band spectrum available to wireless carriers quickly to drive 5G deployment in the U.S. (including to American heartland communities beyond MMWave deployments in the dense urban canyons of our biggest cities) while fully protecting existing C-band subscribers who provide vital video and other services to more than 100 million homes. If our proposal is accepted by the Commission in all material respects, Intelsat and SES will need additional satellite capacity to effectuate our plan.

Intelsat and SES anticipate that the CBA plan will require them to procure a total of 8 new satellites and, if the CBA plan is accepted, they are prepared to do so. This assessment is based on future demand currently expressed by CBA member's customers. These new satellites will enable Intelsat and SES to operate approximately the same amount of capacity to carry video and other services that they have today in 500 MHz, but using only 300 MHz of spectrum. These new satellites are part of the secret to clearing C-band spectrum for 5G while fully protecting current C-band customers. No other plan before the Commission contemplates the procurement of 8 new satellites. And to be clear, under the CBA plan, all current C-band users will continue to be served in C-band and their expenses for filters, and other reasonable transition expenses, will be paid by CBA.

It is critically important to note that the satellite operators would not fund the procurement of these 8 satellites solely for the purpose of maintaining their current businesses - their procurement is necessitated only by the need to clear spectrum for 5G. It is the prospect of receiving proceeds from secondary market transactions that provides the economic incentive to procure these satellites, enabling the spectrum clearing plan. The C-Band Alliance members will not voluntarily procure 8 new satellites pursuant to any plan in the NPRM or in the Comments other than the C-Band Alliance plan. Other plans put forth by T-Mobile and Google ignore the necessity of creating incremental capacity to maintain current user services. To be clear, every plan for clearing C-band spectrum, other than the CBA plan, necessarily would reduce the capacity for today's C-band users.

The C-Band Alliance has presented in good faith a thoughtful, realistic and immediately actionable plan that uniquely serves the twin objectives of (1) repurposing substantial C-band spectrum for 5G and (2) protecting current C-band users. CBA is eager to work with the Commission and with all stakeholders to make this plan a reality as soon as possible in the interest of not falling too far behind other countries in deploying mid-band spectrum for 5G.

A copy of this email is being filed today in the public C-band docket by our Counsel.

Thanks to all.

Preston Padden
C-Band Alliance
202-329-4750